

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RED SEA PACIFIC SDN BHD c/o PACIFIC SHIP
MANAGERS SDN BHD,

Plaintiff,

07 Civ 3033 (BSJ)

- against -

TONGLI SHIPPING CO. LTD. and TONGLI LIMITED,

Defendants.

**DECLARATION OF NANCY R. PETERSON
IN SUPPORT OF PLAINTIFF'S REQUEST FOR
CLERK'S CERTIFICATE AND ENTRY OF DEFAULT**

Nancy R. Peterson declares under penalty of perjury of the laws of the United States of America as follows:

1. I am an attorney in the firm of Lennon, Murphy & Lennon, LLC, counsel to the Plaintiff herein, RED SEA PACIFIC SDN BHD c/o PACIFIC SHIP MANAGERS SDN BHD, (hereinafter "Plaintiff"). I have personal knowledge of the matters stated herein. I submit this Declaration in Support of Plaintiff's Request for a Certificate of Default against Defendant, TONGLI SHIPPING CO. LTD and its alter ego, alias and/or agent TONGLI LIMITED (hereinafter "Defendants").

2. I certify that neither of the Defendants, the parties against whom a notation of default is sought, are infants, in the military, or incompetent persons.

3. I further certify that Defendants have failed to plead or otherwise defend themselves within this action although they have been served with process and Plaintiff has also attached Defendants' property in the District and provided notice thereof as per Local Rule B.2.

4. Defendants have failed to make an appearance with the Court.

5. I also certify that the pleadings to which no formal response has been made, particularly the Summons, Complaint, Affidavit in Support of Prayer for Attachment, Rule 7.1 Disclosure Statement, Ex Parte Order, and Process of Maritime Attachment and Garnishment have been properly served on Defendants via FedEx international courier and facsimile on or about April 19, 2007 and received by Defendants on April 23, 2007. See Affidavit of Service, (with Fed Ex and facsimile confirmation sheets annexed thereto) attached hereto as Exhibit 1.

6. Service on Defendant Tongli Shipping Co. Ltd. is deemed to be service upon Tongli Limited in that Tongli Limited is the alter ego, alias and/or agent of Tongli Shipping Co. Ltd.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 7, 2008.



Nancy R. Peterson

Exhibit 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Red Sea Pacific SDN BHD c/o Pacific Ship
Managers SDN BHD

Plaintiff,

07 Civ 3033 (BSJ)

- against -

Tongli Shipping Co. Ltd. and Tongli Limited

Defendants.

AFFIDAVIT OF SERVICE

State of Connecticut)
)
County of Fairfield) ss: Town of Southport

NANCY R. PETERSON, having been duly sworn, deposes and states the following
under oath:

1. I am a member in good standing of the Bar of this Court and an attorney in the law firm of Lennon, Murphy & Lennon, LLC, which represents the interests of the Plaintiff herein.

2. Service of the Summons, Complaint, Ex-Parte Order, and Process of Maritime Attachment in the instant action, was made on the Defendants Tongli Shipping Co. Ltd. and Tongli Limited by FedEx courier and Facsimile on April 19, 2007 pursuant to Rule B(2)(b) of the Supplemental Rules for Certain Admiralty and Maritime Claims. *See FedEx confirmation sheet and Facsimile confirmation sheet annexed hereto as Exhibits "1." and "2."*

3. FedEx confirmed that Defendant received the above on April 23, 2007.

Dated: Southport, CT
August 21, 2007


Nancy R. Peterson

Sworn to and subscribed before me this
21st day of August 2007.

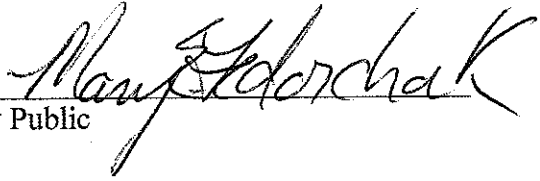

Notary Public

Exhibit 1

11 WEST 42ND STREET, SUITE 900
 NEW YORK, NY 10036
 (212) 354-0025
 Fax (212) 869-0067

TL@Tisdale-Lennon.com



TISDALE & LENNON, LLC
 ATTORNEYS AT LAW

10 SPRUCE STREET
 SOUTHPORT, CT 06890
 (203) 254-8474
 Fax (203) 254-1641

www.Tisdale-Lennon.com

April 19, 2007

Via FedEx and Facsimile 011 86-535-622762

Tongli Shipping Co. Ltd. and Tongli Shipping
 Shandong Province Yantai City
 Zi Rong District
 No. 80 Chaoyang Street, Room 1506, Quli Manson,
 Postal Code 261001
 China

Re: Red Sea Pacific Sdn Bhd c/o Pacific Ship Managers Sdn Bhd v. Tongli
Shipping Co. Ltd. and Tongli Shipping
 Docket Number: 07 Civ. 3033 (BSJ)
 Our Reference Number: 07-99-1663

Dear Sir or Madam:

We represent the Plaintiff, Red Sea Pacific Sdn Bhd c/o Pacific Ship Managers Sdn Bhd., in the above referenced lawsuit. We write to advise you that pursuant to an ex parte order of maritime attachment and garnishment issued in the above referenced lawsuit, your property was attached by American Express Bank on or about April 19, 2007 in the amount of \$139,433.05.

Please find attached to this letter all pleadings filed in the above referenced lawsuit including, but not limited to, the Summons and Complaint. If you have any questions or concerns, please contact us at your convenience. This letter is sent pursuant to Local Rule B.2 of the Local Rules for the United States District Court for the Southern District of New York.

Sincerely,

Nancy R. Peterson

THOMAS L. TISDALE
 ADMITTED IN NY & CT

PATRICK F. LENNON
 ADMITTED IN NY & CT

CHARLES E. MURPHY
 ADMITTED IN NY & CT

KEVIN J. LENNON
 ADMITTED IN NY & CT

LAUREN C. DAVIES
 ADMITTED IN CT

NANCY R. PETERSON
 ADMITTED IN NY & CT

Name/Fax No.	Mode	Start	Time	Page	Result	Note
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P.1
 TISDALE & LENNON
 Fax: 203-254-1641
 Apr 19 2007 02:52pm
 ** Transmit Confirmation Report **

Exhibit 2

1663

This tracking update has been requested by:

Company Name: TISDALE LENNON LLC

Name: Dawn Kubie

E-mail: 'not provided by requestor'

Our records indicate that the following shipment has been delivered:

Tracking number:	798156121760
Reference:	1663
Ship (P/U) date:	Apr 19, 2007
Delivery date:	Apr 23, 2007 11:09 AM
Sign for by:	S.WANG
Delivered to:	Receptionist/Front Desk
Service type:	FedEx International Priority
Packaging type:	FedEx Envelope
Number of pieces:	1
Weight:	1.00 lb.

Shipper Information
DAWN KUBIE
TISDALE LENNON LLC
10 SPRUCE STREET
SOUTHPORT
CT
US
06890

Recipient Information
TONGLI SHIPPING
TONGLI SHIPPING CO. LTD.
RM 1506 15F QILI MANSION
80 CHAOYANG ST
YANTAI
CN
264001

Special handling/Services:
Deliver Weekday

Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 7:54 AM CDT on 04/23/2007.

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All weights are estimated.

To track the latest status of your shipment, click on the tracking number above, or visit us at fedex.com.

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Thank you for your business.

4/23/2007